

1 HANSON BRIDGETT LLP
2 KURT A. FRANKLIN, SBN 172715
3 kfranklin@hansonbridgett.com
4 SAMANTHA WOLFF, SBN 240280
5 swolff@hansonbridgett.com
6 CAROLINE LEE, SBN 293297
7 clee@hansonbridgett.com
8 JENNIFER ANIKO FOLDVARY, SBN 292216
9 jfoldvary@hansonbridgett.com
10 425 Market Street, 26th Floor
11 San Francisco, California 94105
12 Telephone: (415) 777-3200
13 Facsimile: (415) 541-9366

14 HANSON BRIDGETT LLP
15 TYSON M. SHOWER, SBN 190375
16 tshower@hansonbridgett.com
17 LANDON D. BAILEY, SBN 240236
18 lbailey@hansonbridgett.com
19 500 Capitol Mall, Suite 1500
20 Sacramento, California 95814
21 Telephone: (916) 442-3333
22 Facsimile: (916) 442-2348

23 OTTEN LAW, PC
24 VICTOR OTTEN, SBN 165800
25 vic@ottenlawpc.com
26 KAVITA TEKCHANDANI, SBN 234873
27 kavita@ottenlawpc.com
28 3620 Pacific Coast Highway, #100
Torrance, California 90505
Telephone: (310) 378-8533
Facsimile: (310) 347-4225

29 Attorneys for Plaintiffs
30 CORY SPENCER, DIANA MILENA
31 REED, and COASTAL PROTECTION
32 RANGERS, INC.

33
34 **UNITED STATES DISTRICT COURT**
35
36 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

37 CORY SPENCER, an individual;
38 DIANA MILENA REED, an
39 individual; and COASTAL
40 PROTECTION RANGERS, INC., a
41 California non-profit public benefit
42 corporation,

43 CASE NO. 2:16-cv-02129-SJO (RAOx)

44
45 **DECLARATION OF BLAKE WILL IN
46 SUPPORT OF PLAINTIFFS' MOTION
47 FOR CLASS CERTIFICATION**

48 Complaint Filed: March 29, 2016
49 Trial Date: November 7, 2017

1 || Plaintiffs,

2 | v.

3 LUNADA BAY BOYS; THE
4 INDIVIDUAL MEMBERS OF THE
5 LUNADA BAY BOYS, including but
not limited to SANG LEE, BRANT
6 BLAKEMAN, ALAN JOHNSTON
7 AKA JALIAN JOHNSTON,
MICHAEL RAE PAPAYANS,
8 ANGELO FERRARA, FRANK
9 FERRARA, CHARLIE FERRARA,
and N. F.; CITY OF PALOS
10 VERDES ESTATES; CHIEF OF
11 POLICE JEFF KEPLEY, in his
representative capacity; and DOES
12 1-10.

Judge: Hon. S. James Otero
Date: February 21, 2017
Time: 10:00 a.m.
Crtrm.: 10C
First Street Courthouse

Defendants.

15 I, Blake Will, declare as follows:

16 1. I grew up in Palos Verdes and lived there from the age of 5 to
17 18. I attended Miraleste High School and the University of Southern
18 California. After I graduated from college, I moved to Manhattan Beach,
19 where I lived until I was 25 years old. I currently reside near Hartford,
20 Connecticut. I own a marketing agency that builds websites. I have
21 personal knowledge of the matters stated in this declaration and, if called as
22 a witness, I could and would testify competently as to its contents.

23 2. I started surfing when I was a teenager. There are many good
24 places to surf in Palos Verdes Estates, like Haggerty's and Indicator, but in
25 my opinion none of them are as special as Lunada Bay. Lunada Bay does
26 not compare to other surf locations because Lunada Bay is primarily a right
27 hand point break that can handle any size swell when the conditions are
28 right. Haggerty's and Indicator break left and are not as sheltered so they

1 not are protected from the wind. Lunada Bay is also just a nice pleasant
2 bay.

3 3. Despite growing up in Palos Verdes, I was not allowed to surf
4 Lunada Bay. I suspect this was in part because I did not go to Palos Verdes
5 High School. It seemed that people from Miraleste High School, were not
6 allowed to set foot in Lunada Bay because we were considered outsiders.

7 4. When I was growing up, it was known that Lunada Bay was ruled
8 by the Lunada Bay Boys. The Bay Boys would threaten, harass, and beat
9 up all outsiders, and would vandalize their cars. They ruled with an iron fist.
10 To my knowledge, there is no place in the world where the local surfers
11 display the kind of hostility, aggression, or exclusionary attitude that the
12 Lunada Bay Boys display.

13 5. The Bay Boys are very exclusive then and I believe they still are
14 to this day. They treat Lunada Bay like it is their private property. They
15 believe that it is their God-given right to own and protect Lunada Bay. It is
16 my understanding that about 70 to 90 men are in the Lunada Bay Boys.
17 This tight-knit group is comprised of older guys and their kids who are
18 carrying on the legacy of exclusion. Only those who are in the group of
19 Lunada Bay Boys are allowed to surf Lunada Bay. Outsiders are unable to
20 simply "join" the Bay Boys. I could beg, plead, and offer money to the Bay
21 Boys to be allowed to surf at the Bay, but they still would not allow me to join
22 their ranks.

23 6. In my early twenties, I lifeguarded at city-owned pools in Watts, a
24 rough town where well-known gangs like the Bloods and the Crips lived. I
25 saw firsthand that Watts was a very dangerous place due to the gang
26 violence. Nonetheless, I would feel safer playing a basketball game in Watts
27 amidst the Bloods and Crips than I would trying to surf at Lunada Bay.

28 7. Although I knew that I would be hassled if I tried to surf Lunada

1 Bay, I attempted to surf there five or six times when I was a teenager and in
2 my early twenties. During these occasions, I would get dropped off by
3 friends so that my car would not be vandalized while I tried to surf. I did this
4 because my friends' cars had been vandalized when they tried to surf at
5 Lunada Bay. I also did not bring any belongings with me, like a backpack or
6 even surf wax, because I knew that my belongings would be stolen or
7 vandalized while I was surfing. On the walk down to the beach, the Bay
8 Boys would verbally and physically abuse me and would get in my face. As
9 a teenager, I was terrified to be bullied by men in their twenties and thirties.
10 Once I got down to the beach and paddled out, I was threatened so severely
11 that I stopped surfing before I was finished.

12 8. On one of the times I tried to surf Lunada Bay, I was harassed by
13 one of the Bay Boys named Kelly Logan and his buddies. Logan was known
14 as one of the "enforcers" who ruled Lunada Bay through fear, intimidation,
15 and violence. Logan paddled up to me, got in my face, and yelled
16 profanities like, "get the fuck out of here," "we'll beat your ass," "don't ever
17 come back," and "you don't belong here." Logan also told me he was going
18 to kill me. This intimidation scared me and convinced me not to try to surf
19 Lunada Bay again.

20 9. I visit Palos Verdes every year because my mother still lives
21 there. On one of my visits with my son about 10 years ago, I let my son ride
22 one of my father's classic Harley Davidson motorcycles. Because my son
23 was unfamiliar with the neighborhood, I followed him in my car so I could
24 help him navigate around Palos Verdes. My son rode out to Lunada Bay,
25 and was stopped by a Palos Verdes Estates police officer. The police
26 asked my son if he was lost and if he knew where he was going. It was
27 clear to me that the police only pulled over my son because he looked like a
28 hardcore biker who did not belong in Palos Verdes Estates. When I got out

1 of my car to see what was going on, the police officer put his hand on his
2 gun and asked me who I was and what business I had being in Palos
3 Verdes. This was just one of the many examples I have heard about in
4 which the Palos Verdes police participate in the intimidation of the Bay Boys.
5 The Palos Verdes police officers help the Bay Boys kick out the "riffraff,"
6 which in this instance, included my harmless son.

7 10. To my knowledge, the aggression and intimidation that I
8 experienced thirty years ago and that my son and I experienced ten years
9 ago is still ongoing. Although I visit my mother frequently, I do not visit
10 Lunada Bay because it is unsafe for outsiders like us to go there. This
11 angers me because I still surf all over, including in other parts of Palos
12 Verdes, as well as in Hawaii and Mexico. The only way Lunada Bay would
13 be a safe place would be to keep the Lunada Bay Boys away from it.

14 19. Lunada Bay is a public beach, and I hope to be able to visit it to
15 surf without fear of physical and verbal attack as to me and my property. I
16 want the aggressive Bay Boys and other locals to be barred from using this
17 beach for sufficient time to change attitudes, and return this beach back to
18 the public. In short, I want to be able to visit Lunada Bay without being
19 harassed and to be safe in my person and property. And if I am harassed, I
20 want the City of Palos Verdes Estates police to take my complaints
21 seriously.

22

23 I declare under penalty of perjury under the laws of the United States
24 of America that the foregoing is true and correct.

25 Executed in Ashford, Connecticut on December 27, 2016.

26 

27 BLAKE WILL

28